

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

<p>IOWA PRIMATE LEARNING SANCTUARY d/b/a GREAT APE TRUST and APE COGNITION AND COMMUNICATION INSTITUTE,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ZOOLOGICAL FOUNDATION OF GEORGIA, INC. d/b/a ZOO ATLANTA, DEMOCRATIC REPUBLIC OF CONGO, JAPAN MONKEY CENTRE INSTITUTE AND MUSEUM OF PRIMATOLOGY, SUE SAVAGE-RUMBAUGH, Ph.D., and BONOBO HOPE INITIATIVE, INC.</p> <p>Defendants.</p>	<p>Case No. 4:10-cv-00052 Hon. Magistrate Judge Ross Walters</p> <p>CLAIMANTS/DEFENDANTS' SUE SAVAGE RUMBAUGH AND BONOBO HOPE INITIATIVE'S WITNESS LIST</p>
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COME NOW Claimants/Defendants' Sue Savage Rumbaugh And Bonobo Hope
Initiative and hereby provide their Witness List as follows:

The following witnesses may be called in Claimants' case in chief at the evidentiary hearing to be held on this matter. The description of the subject matter of their testimony is not intended to be, nor is it, an exact or exclusive description of that witness's testimony. Claimants reserve the right to call other witnesses in their case in chief should the need become apparent. Claimants also reserve the right to not call a witness who has been identified herein.

1. Dr. Sue Savage-Rumbaugh. Dr. Savage-Rumbaugh is a world-renowned scientist and party to this case. Dr. Savage-Rumbaugh will testify regarding: (i) the history of her acclaimed scientific research and the trajectory of that research since its inception; (ii) the creation of Bonobo Hope Initiative, Inc. and its role in overseeing the science and research concerning the bonobos; (iii) the intent of the parties in entering into the

settlement agreements as a result of this interpleader action; (iv) the intent of the parties in including certain provisions in the settlement agreements; (v) the importance of the wellbeing of the bonobos and her research trajectory and intellectual property residing in the bonobos, within the scientific community and to humanity at large; (vi) her sudden banishment from the facilities now housing the bonobos, contrary to duly passed IPLS corporate resolutions and the settlement agreements, owing to a conspiracy to do so entered into by IPLS/ACCI and a third party, Yerkes National Primate Research Center; (vii) the likely harm to the bonobos if the current ACCI research trajectory is continued and the bonobos' lifelong research trajectory abolished; (viii) the safety and health hazards posed by the current facility, and the likely harm to the bonobos, should they be forced to continue to reside there; and (ix) the contingent arrangements that BHI has made to relocate the bonobos to an adequately funded and financially secure self-contained sanctuary in Missouri.

2. Heather Pugh Housh. Ms. Housh works as an employee of ACCI at the facilities where the bonobos are currently housed. Ms. Housh has worked with these bonobos since childhood. Ms. Housh will testify regarding the treatment of the bonobos by the current operators of the facility in contrast to their treatment during periods when Dr. Savage-Rumbaugh has been present. Claimants **do not** guarantee Ms. Housh's presence at the hearing.
3. Dr. Laurent Dubreuil. Dr. Dubreuil is a board member of Bonobo Hope Initiative, Inc. since 2012, and a Professor of French and Comparative Literature at Cornell University, where he is a member of the graduate Field of Cognitive Studies. Dr. Dubreuil will testify regarding: (i) the parties' intentions; (ii) the role of Bonobo Hope and its current interests in the bonobos; (iii) the illegitimacy of resolutions passed by BHI in November 2013 that purported to eviscerate BHI's oversight of science at IPLS; (iv) BHI's activities since November 2013, including its unsuccessful efforts to oversee or monitor the research and the conditions at the Facility, its efforts to finance and provide a viable home for the bonobos in a more appropriate location, its vote of no confidence in the science directors at ACCI that BHI had allegedly appointed in November 2013; (v) the contrast between the research environment intended by the BHI and pre-November 2013 IPLS boards and the settlements as of February 2013; and (vi) conditions personally observed at the Lab since November 2013.
4. Dr. Russell E. Tuttle. Dr. Tuttle is Professor of Anthropology and Evolutionary Biology at the University of Chicago and considered the foremost primatologist in the world. Harvard University Press published his treatise, Apes and Human Evolution, one year ago. Dr. Tuttle was an initial member of the Great Ape Trust's Scientific Advisory Board but resigned because of perceived diminution of the value of Dr. Rumbaugh's research and role by the administration of the Trust. Dr. Tuttle will testify regarding: (i) the origin, legitimacy of and the importance of Dr. Rumbaugh's research trajectory; (ii) the inferiority of the credentials of Drs. Jared Taglialatela and William Hopkins for purposes of continuing the proper research trajectory without Dr. Rumbaugh's involvement and oversight; (iii) the inappropriateness and inadequacy of the research protocols now in place at ACCI; (iv) the impropriety of ACCI's associating with Yerkes for purposes of permitting any invasive research on the bonobos involving anesthesia, as

well as the resulting banishment of Dr. Rumbaugh from access to her bonobo research subjects; (v) an eyewitness assessment of the well-being of the bonobos; and (vi) an assessment of the hazards to the bonobos posed by the current site and facility, including the apparent failure of IPLS or ACCI to conduct toxicology tests on the deceased bonobos, Panbanisha and Matata.

5. Ryan Sheldon. Mr. Sheldon is the founder and owner of National Control Devices, LLC, a technology company based in Missouri with a national clientele that manufactures products which allow individuals to control electronic devices from smartphones or computers anywhere in the world. Mr. Sheldon will testify regarding: (i) his support of a sustainable relocation plan for the bonobos; (ii) the creation of a sustainable long term facility for the bonobos in Missouri that is near completion; and (iii) his commitment to ongoing financial support for the care of the bonobos after they are transferred to this facility.
6. Lyle Simpson. Mr. Simpson has served as corporate counsel to both Iowa Primate Learning Sanctuary d/b/a Great Ape Trust and Bonobo Hope Initiative, Inc. as well as personal counsel to Dr. Rumbaugh. Mr. Simpson will testify regarding: (i) the formation of Bonobo Hope Initiative, Inc.; (ii) the personal vision he imposed on IPLS and BHI as a team going forward; (iii) the administrative dissolution of IPLS by the State of Iowa in August 2013 against a \$75,000 tax lien incurred by IPLS; (iv) the November 2013 resolutions which had the undisclosed intent or effect of interfering with the intentions of the parties in the settlement agreements; (v) the insistence by Yerkes that Dr. Rumbaugh be banned from the facility as a condition of its association with ACCI; and (vi) his many communications with the Governor and U.S. Senators of Iowa concerning the unique value of Dr. Rumbaugh's research trajectory. Claimants **do not** guarantee Mr. Simpson's presence at the hearing.
7. Derek Wildman. Mr. Wildman is the Secretary of Bonobo Hope Initiative, Inc. Mr. Wildman will testify regarding his personal eyewitness accounts of the condition of the laboratory where the bonobos are currently being housed, the non-existence of any meaningful research and the importance of the safety and welfare of the bonobos going forward. Claimants **do not** guarantee Mr. Wildman's presence at the hearing.
8. Itai Roffman. Mr. Roffman is a member of the board of Bonobo Hope Initiative, Inc. Mr. Roffman will testify regarding the condition of the laboratory where the bonobos are currently being housed, and an assessment of the hazards to the bonobos posed by the current site and facility. Claimants **do not** guarantee Mr. Roffman's presence at the hearing.
9. Sally Jewell Coxe. Ms. Coxe is the Founder & President of the Bonobo Conservation Initiative. Ms. Coxe will testify regarding the Democratic Republic of the Congo (a party to this interpleader action and one of the settlement agreements), and its support of Dr. Rumbaugh and Bonobo Hope Initiative's claims in this matter, as well as its current concerns as to the ownership and care of the bonobos and its preparedness to host the bonobo colony should it ultimately be permitted to relocate to Africa. Claimants **do not** guarantee Ms. Coxe's presence at the hearing.

DATED: May 13, 2015

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Certificate of Service

The undersigned hereby certifies that a true copy of Defendants Dr. Sue Savage-Rumbaugh's and Bonobo Hope Initiative's Witness List was served upon the following parties by through the ECF filing system on the 13th day of May, 2015.

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